

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

New England Sports Network, L.P.,
Plaintiff,
v.
Alley Interactive LLC (CT); Ariel Legassa,
Defendants.

Civil Action No. 22-CV-10024-ADB

**PLAINTIFF'S EX PARTE MOTION FOR APPROVAL OF
ATTACHMENT BY TRUSTEE PROCESS**

Plaintiff New England Sports Network, L.P. ("NESN") hereby respectfully moves, pursuant to Mass. R. Civ. P. 4.2, made applicable in this Court by Fed. R. Civ. P. 64, for an order approving trustee process for the attachment of bank accounts in the amount of \$574,421.88 of funds and credits entrusted to or deposited in the hands of American Broadcast Employees Federal Credit Union, standing in the name of any of the Defendants and their associates identified herein. NESN incorporates by reference its (1) Complaint in this action; (2) Affidavit of Mary Breiter; and (3) *Ex Parte* Motion for Approval of Attachment by Trustee Process, all filed in this Court on January 7, 2022.

In further support hereof, NESN states that on January 10, 2022, this Court issued a Trustee Summons to Santander Bank, N.A. to attach funds up to \$575,000. Although Santander has not formally Answered, it informed undersigned counsel that the account belonging to Alley Interactive LLC contained only \$578.12, and Santander attached these same funds. NESN is aware of a separate account in at least one Defendant's name at the American Broadcast Employees Federal Credit Union, bearing the account number 756612697505.

For these reasons, NESN respectfully requests an *ex parte* prejudgment trustee process attachment on any bank accounts of Defendants held at American Broadcast Employees Federal Credit Union in the amount of \$574,421.88.

Respectfully submitted,

NEW ENGLAND SPORTS NETWORK,
L.P.,

By its counsel:

Dated: January 14, 2022
Boston, Massachusetts

/s/ Christopher M. Morrison
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